

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

JANE DOE,

Case No. 4:21-cv-3049

Plaintiff,

Hon. John M. Gerrard

v.

**DECLARATION OF PLAINTIFF**

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA, et al.;

Defendants.

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I, Plaintiff Jane Doe,<sup>1</sup> am over 18 years of age and competent to testify to the matters set forth below from personal knowledge or from records kept in the ordinary course of business. I declare the following under penalty of perjury:

1. My husband started his PhD program in Fall 2013, and I began my PhD program in summer 2014 at the University of Nebraska-Lincoln (“UNL”).
2. We came to Nebraska for the sole purpose of earning PhD degrees from UNL.
3. I came under a F-2 student visa and switched to an F-1 visa later.
4. We were both accepted at UNL as international students.
5. My husband was fully funded at another American university, but instead chose UNL because he became interested in the Electrical Engineering PhD program at UNL, and later he was admitted to the Computer Science Master of Science program at UNL as well.
6. I chose UNL because my husband chose it, and we did not want to be separated for the duration of our PhD programs.

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<sup>1</sup> Jane Doe is a pseudonym.

7. Both my husband and I had master's degrees from another institution prior to enrolling at UNL.
8. During my time at UNL, I was repeated sexually harassed and stalked by my advisor, John Roe ("Roe").<sup>2</sup>
9. As English was not my first language, there were certain English words that I did not know; for example, the word "stalking."
10. In August 2016, after Defendant Tamiko Strickman found that Roe violated UNL's Title IX policy in his conduct towards me, she directed the graduate school of engineering to cover my tuition and fees for the remaining six hours of my Master of Science degree in Applied Mechanics with a specialization in Materials Engineering.
11. UNL covered my tuition as Defendant Strickman promised, but I was never reimbursed for the applicable fees.
12. In summer 2016, I applied to the UNL master's degree program in Applied Mechanics, with a specialization in Materials Engineering, as an addition to the PhD program in Mechanical Engineering in which I was already enrolled.
13. When I applied for the master's degree program in Applied Mechanics, I did not intend to discontinue pursuing my PhD.
14. The master's degree was never intended to replace my PhD degree, as I got my first MSc degree in 2012 from another university.
15. I started the master's degree program in Applied Mechanics in the summer or fall of 2016 and was awarded the degree in August 2017.

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<sup>2</sup> John Roe is a pseudonym.

16. I applied to Georgia Tech because IEC and Judy Walker scared me and closed my case, and I did not feel that UNL would protect me from Roe.
17. On March 7, 2017, I emailed Strickman and copied Officer Eric Fischer regarding additional acts of harassment from Roe.
18. Defendant Strickman did not contact Officer Fischer on my behalf. I copied him on the email myself.
19. Neither Fischer nor Defendant Strickman nor any other UNL representative provided me with a safety plan or assisted me with seeking for potential alternative office locations to allow me to avoid interacting with Roe.
20. After I reported Roe's additional harassment to Fischer and Defendant Strickman in March 2017, Defendant Strickman never notified me that she had talked to John Roe.
21. Defendant Strickman did not advise me of my rights under Title IX such as filing another Title IX complaint against John Roe.
22. Defendant Strickman did not put my March 2017 report in harasser's record, as she said in her deposition.
23. Defendant Strickman did not offer me any supportive measures such as changing schedules or workstations to protect me from John Roe.
24. In July 2017, I asked UNL to drop my PhD.
25. I made the decision because I felt there was no other way for me to protect myself from continued interactions with John Roe.
26. Transferring to Georgia Tech meant starting my PhD program over again from the beginning.

27. I had around one year left of my UNL PhD program, so transferring to Georgia Tech and starting over was a difficult decision for me.

28. I began my new PhD program at Georgia Tech in August 2017.

Pursuant to 28 U.S.C. §1746, I certify under penalty of perjury that I have ready the foregoing declaration consisting of twenty-eight (28) numbered paragraphs and that it is true and correct to the best of my knowledge, information, and belief.

Executed on this 13<sup>th</sup> day of November, 2023.

*Jane Doe*

ID t7JUmH57pemenjhKMvA2KXWw

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Plaintiff Jane Doe

## eSignature Details

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Signer ID:	t7JUmH57pemenjhKMvA2KXWw
Signed by:	[REDACTED]
Sent to email:	[REDACTED]
IP Address:	[REDACTED]
Signed at:	Nov 13 2023, 6:26 pm EST